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June 12, 2020

**By ECF**

Hon. A. Kathleen Tomlinson  
United States Magistrate Judge  
United States District Court  
for the Eastern District of New York  
Alfonse M. D'Amato Federal Building  
100 Federal Plaza  
Central Islip, NY 11722

Re: *Joseph Jackson v. Nassau County et al.*, Docket No. 18-cv-3007 (JS) (AKT)  
Our File No.: 12473.00014

Dear Judge Tomlinson:

Wilson Elser represents the County Defendants in the referenced action. While depositions are stayed pending the Court's decision on the motions to dismiss filed by the County Defendants and the Village Defendants, pursuant to Your Honor's order limited documentary discovery is to proceed.

In connection therewith, we are submitting the enclosed subpoena and request that it be So Ordered by the Court. The subpoena seeks, medical records, disciplinary records and visitation records concerning plaintiff Joseph Jackson from the Fishkill Correctional Facility.

We emailed plaintiff's counsel and the counsel for the Village of Freeport today with a copy of the subpoena and advised them we would be submitting this application. Counsel for plaintiff objected, and has asked us to advise the Court that they will be moving to quash and for a protective order. We did not hear from counsel for the Village of Freeport.

Respectfully submitted,

WILSON, ELSE, MOSKOWITZ, EDELMAN & DICKER LLP

/s/ *Lalit K. Loomba*

Lalit K. Loomba  
Attachment  
Cc: Counsel of Record (via ECF)

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